

Dennis J. Cook
4127 Ivanhoe Avenue
Norwood, Ohio 45212

- 4/3/98 Dennis Cook. Letter from Jack Cameron ref. scheduling disciplinary hearing for 4/9/98 at 5 p.m. and pre-suspension hearing for same date at 4 p.m.; Cameron is scheduling his hearing before the predisciplinary hearing is held; it is apparent this is going to be a hanging party; advised client that these guys are so bold they schedule hearings before they are even necessary; all are yes men for Hochbein. .50 hrs.
- 4/6/98 Dennis Cook. Read and review letter from Jack Cameron ref. wanting list of witnesses for Cook disciplinary hearing; letter to Cameron in response to his letter with list of witnesses. 1.25 hrs.
- 4/7/98 Dennis Cook. Letter from Jack Cameron; meet with client; it is going to be a set up and they are simply waiting for him to get rid of him for helping Perkins and Jones and fighting discrimination. 1.75 hrs.
- 4/22/98 Letter from Joe Mordino with public records regarding Larry Partin; review letter; Partin threatened to kill Cook; nothing is being done; met with Cook and told him to stay close to older men he can trust so he has a witness to whatever is going on at Public Works involving him. 1.75 hrs.
- 4/30/98 Dennis Cook & Ray Erwin; Letter from Joe Mordino; putting the pressure on Cook and other men about the silliest of issues; need to follow the rules and comply with requests; Perkins is going to sign affidavit setting forth what they did to him and other men. 2.25 hrs.
- 5/4/98 Dennis Cook. Received signed certified mail return receipt cards addressed to Gary Hubbard, Timothy Garry and Kevin Cross. N/C
- 5/5/98 Letter to Joseph Mordino concerning workplace violence disciplinary hearing and additional charges filed against Cook; request for continuance of hearing since I am scheduled to be in Hamilton County Municipal Court. .50 hrs.
- 5/15/98 Extensive meeting with Cook reference filing of EEOC charge and he went to EEOC to file charge concerning his removal from leadman position and appointment of Osterday to leadman; EEOC will investigate and determine if the facts warrant the allegations he made; EEOC is a government agency and he needs to take advantage of EEOC to pursue the issue; discussed with him the Rutherford Institute and financial assistance it may provide in the event he requires money for the pursuit of his claim; prepared a fax for him to send to Rutherford Institute per his

request; discussed with him the need to keep a record of what is occurring at Public Works since no one will believe him or his witnesses concerning the level of outright violations; the Law Director will not do anything to put a stop to the conduct of Hubbard and Cross and Hochbein is receiving copies of everything which is occurring and he is doing nothing to stop it. 4.25 hrs.

- 5/20/98 Dennis Cook. Letter to D. Cook dated 5/19/98 from EEOC on charge #221980645; Cook brought in copy of letter received from EEOC and explained to me he is pursuing issue of removal from leadman with EEOC; needs to continue to follow up with EEOC and if EEOC needs information I will assist him in getting the information; removed from driving the street sweeper and he was the only one whose license was checked; call EEOC and report it and take whatever action they instruct; Hubbard is mentally challenged and does not have the integrity to do the right thing; you can put an expensive suit on him but he is still an individual with no conscience. 3.75 hrs.
- 5/20/98 Dennis Cook. Read and review letter to D. Cook dated 5/19/98 from EEOC on charge #221980646; meeting with Cook, advised to work with investigator or whoever is assigned to case and if he needs records I will obtain them for him. .75 hrs.
- 6/5/98 Dennis Cook. Fax from Jennifer Schans of Rutherford Institute ref. religious discrimination in workplace; Cook needs financial assistance to protect his job and pay the expenses he is incurring to try to keep his job and Rutherford may assist him. .25 hrs.
- 6/18/98 Dennis Cook. Copy of 6/17/98 letter to Dennis Cook from EEOC on charge no. 221980717; new charge filed by Dennis and it expands on the prior charges asserted; needs to pursue all avenues; EEOC does not exclude grievances and SERB claims. 1.75 hrs.
- 6/18/98 Dennis Cook. Copy of 6/17/98 letter to Dennis Cook from EEOC on charge no. 221980645 amended; boiler plate letter and met with Cook to tell him to continue to cooperate with EEOC and to continue to notify them of new actions taken by Norwood, Cross and Hubbard as they occur. 1.25 hrs.
- 7/2/98 Meet with Cook reference being sent home on this date because of air hammer job; Hubbard came to jobsite and picked him out to do heaviest work; Cook has bad back and neck and they are simply coming after him because of EEOC charges and he needs to do his best; told him to call EEOC. 1.75 hrs

- 7/8/98 Cook went to see Gangl; bad back; no weedeater; meet with client and comply with the orders because they are waiting for you to get upset or do something in violation of the rules. 1.75 hrs.
- 7/14/98 Dennis Cook. Copy of 7/13/98 letter to Cook from Norwood; meet client concerning psychological evaluation; advised Cook there is no one to talk to in Norwood concerning his treatment as one is worse than the next; Hubbard is out of control but Hochbein won't do anything since he is the one who appointed him; Hochbein likes control and this is his way of making a point-either he is not supervising Hubbard or he is approving what is going on. 1.50 hrs.
- 7/15/98 Dennis Cook. Copy of release from J. Nick Marzella, Ph.D., for Cook; went over release and told Cook to sign as Norwood is looking for a reason to get rid of him; Hochbein already got rid of the chief and assistant chief of the fire department so sign the release. .75 hrs.
- 8/1/98 Cook here to complain about Hubbard and Cross following them and being at Quality Courts; look to get a disciplinary letter; stay calm and we will work through the situation; EEOC filed, SERB filed and file grievance and it will work out eventually. 2.25 hrs.
- 8/14/98 Telephone calls with Cook and office concerning placement of Cook on administrative leave; explained to Cook I am on vacation and there is little I can do until I return from vacation on Saturday; will address the issues immediately on return from vacation and will meet with him on Sunday if necessary to attempt to deal with the situation. .75 hrs.
- 8/16/98 Extensive meeting on Sunday with Cook and Erwin to discuss and review Cross letter dated 8/14/98; evidently it was a bad day for anyone who filed EEOC as Jones was terminated and Cook is placed on administrative leave and it appears from Cross letter Cook will be fired or let go; Cook is upset about the situation and wonders why no one will put a stop to what is going on as he has approached every governmental agency to obtain assistance and none will act to put an end to it; explained that no one in the City will do anything since they are all pursuing the same issue which is to terminate him and he needs to comply with all rules and do as he is told; do not provide Norwood with any reason to discipline him-arrive early for work, be scrupulous about clocking in and out and regardless of the application of the rules to other men he needs to follow every rule; the letter needs to be sent to EEOC for their review as it imposes a suspension for filing EEOC charges as the result of filing EEOC complaints. 5.25 hrs.
SUNDAY
- 8/17/98 Dennis Cook. Received copy of 8/14/98 letter to Dennis from Kevin Cross

ref. His administrative leave; Jones terminated the same day. .75 hrs.

8/18/98 Meeting with Cook reference the issue of 8/14/98 letter and prepare a response to Mordino concerning 8/14/98 letter. Meeting with Cook to explain he is still being paid and he needs to address the issue with the people at EEOC and forward a copy of Cross' 8/14/98 letter to EEOC. Cook cannot understand why he is being targeted for pursuing rights he is entitled by law and explained to him it is inconsequential to Norwood what Cook's rights are or anyone else's rights as Norwood does as it pleases and the Law Department will not put a stop to it either based on incompetency or sheer indifference to his situation. 3.25hrs.

8/20/98 Disciplinary hearing before Cross and Mordino present; it is clear they are out to get rid of Cook; Mordino is a joke as he sits there knowing full well what Hubbard and Cross are doing and does nothing to put a stop to the retaliation against Cook; sit through a hearing on issues which were resolved and now they are brought back for discipline. 1.25 hrs.

8/27/98 Dennis Cook. Letter from Mayor Hochbein ref. Mr. Cook's ULP and requesting details; Hochbein is a joke as he is copied in on every letter and simply plays stupid. 1.5 hrs,

8/27/98 Dennis Cook. Received Entry Extending Time from Joe Mordino to be signed and returned; now filing criminal charges against Cook. .75 hrs.

9/1/98 Dennis Cook. Fax from Kim Zinn of OBES; attempt to get someone to put a stop to the harassment and OBES will not do anything. .25 hrs.

9/7/98 Meet with Cook concerning letter received from EEOC requesting information to be sent concerning his complaint against the City of Norwood. 1.25 hrs.

9/10/98 Dennis Cook. Report from Dr. George Parson; meet with Cook to review his case; explained he needs to continue following the policies to the letter regardless of application of rules to other workers; Cook says they are coming after him, Perkins and Jones because of EEOC filings; I know and it is apparent but he must work through the system to resolve the issues. 1.75 hrs.

9/21/98 Dennis Cook. Fax from Melissa Andler of Paul Bazzano's office with copy of 7/7/98 letter to Dr. Nick Marzella from Gary Hubbard. .25 hrs.

10/22/98 Dennis Cook. Fax from Jennifer Schans of Rutherford Institute; no money at the present time; keep them informed of events. .25 hrs.

- 10/23/98 Dennis Cook. Copy of 10/21/98 letter to Dennis Cook from Jack Patrick of EEOC; wants medical questionnaire completed and medical release to obtain records; meet with Cook to complete questionnaire and sign medical releases for return to Patrick; Cook is still upset with inability to return to his job and advised to pursue EEOC and all other avenues available to him; explained the grievances need to be filed even though nothing comes of them since if they are not filed Norwood will allege you are not pursuing all remedies available; I explained to him it has to be done even though it is useless because at some point in the future when his case gets to Court he will be able to demonstrate he did everything he could to put a stop to the discrimination. 3.75 hrs..
- 11/5/98 Dennis Cook. Copy of Dr. David Helm's 11/4/98 letter to Gary Hubbard ref. Medication Dennis is taking; Cook still trying to get his job back; meeting with Cook and he can't believe what is going on and why no one will step in to put a stop to it; told him every avenue is being pursued. 1.75 hrs.
- 11/17/98 Dennis Cook. Fax from Jennifer Schans of Rutherford Insitute ref. Filing EEOC complaint; still no money and no promise it will be sent. .25 hrs.
- 11/17/98 City of Norwood v. Dennis Cook. Demand for Discovery; Response to Request for Bill of Particulars; Response to Demand for Discovery. .50 hrs.
- 11/19/98 Dennis Cook. Copied pages from his notebook ref. history of city harassment.
- 11/23/98 Dennis Cook v. City of Norwood. Letter from State Personnel Board of Review with Administrative Law Judge's report and recommendation; no relief from this agency; Cook extremely upset but there is nothing which can be done except to pursue all avenues. .50 hrs.
- 12/3/98 Dennis Cook. Copy of 12/3/98 letter to Dennis Cook from Gary Hubbard ref. his vacation; meet with client; losing his vacation because Hubbard is ignorant and vindictive and attempting to push Cook over the edge; explained to Cook to continue to do his job and it will work out when Hubbard appears in front of someone other than Hochbein to justify his actions; Hochbein runs Norwood like Germany was run in WWII and Hochbein is the ringleader of the circus. 1.75 hrs.
- 12/11/98 Cook & Erwin. Copy of Stacy Wall's 12/9/98 letter to Holly Levin ref. Cook & Erwin violating terms of settlement agreement.
- 12/14/98 Dennis Cook v. City of Norwood. Order from State of Ohio State

Personnel Board of Review.

12/17/98 Letter to SERB reference violations of settlement agreement and actions of Cross in the 8/14/98 letter violate SERB law and EEOC law; letter in response to City of Norwood filing. .75hrs.

12/21/98 Dennis Cook v. City of Norwood, Hubbard & Cross. Investigator's Memorandum.

Total Hours: 65.75

Hourly Rate: \$225.00

Copies: \$.00

Expenses: \$.00

Charges: \$14,793.75

TOTAL AMOUNT DUE: \$14,793.75